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Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

Gawker Media LLC, et al., Case No. 16-11700 (SMB)

Debtors. : (Jointly Administered)

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CERTIFICATE OF NO OBJECTION TO DEBTORS' SECOND MOTION FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY CODE SECTION 105(a) AND BANKRUPTCY RULE 9006(b) FURTHER EXTENDING TIME PERIOD WITHIN WHICH DEBTORS MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND BANKRUPTCY RULE 9027

1. On October 3, 2016, the Debtors filed and served the *Debtors' Second Motion for Entry of an Order Pursuant to Bankruptcy Code Section 105(a) and Bankruptcy Rule 9006(b)*Extending Time Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. §

1452 and Bankruptcy Rule 9027 (the "Motion") [Docket No. 314], and attached as Exhibit A thereto, a proposed order granting the Motion (the "Proposed Order").

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Kinja Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

- 2. On October 3, 2016, the Debtors filed the *Notice of Debtors' Second Motion for Entry of an Order Pursuant to Bankruptcy Code Section 105(a) and Bankruptcy Rule 9006(b)*Extending Time Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. §

 1452 and Bankruptcy Rule 9027 (the "Notice") [Docket No. 314].
- 3. Pursuant to the Notice, responses to the Motion were due no later than October 17, 2016 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").
- 4. On October 3, 2016, the Debtors served the Notice, Motion and Proposed Order as set forth in the *Affidavit of Service* [Docket No. 332].
- 5. The undersigned further certifies that the Debtors have not received any answer, objection or other responsive pleading with respect to the Motion and that no such answer, objection or other responsive pleading has appeared on the Bankruptcy Court's docket in the Debtors' chapter 11 cases.

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6. There having been no answer, objection, or other responsive pleadings filed by the Objection Deadline, the Debtors will submit to the Court for entry a proposed order approving the Motion substantially in the form that was attached to the Motion without a hearing.

Dated: October 19, 2016 New York, New York

/s/ Gregg M. Galardi

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